Moving to Work FY2019 Annual Report

Vancouver Housing Authority

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Moving to Work FY2019 Annual Report

VANCOUVER HOUSING AUTHORITY

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SECTION I: INTRODUCTION

THE VANCOUVER HOUSING AUTHORITY

The Vancouver Housing Authority (VHA) is located in the city of Vancouver in Clark County, Washington. The VHA provides affordable rental housing and housing assistance for more than 10,000 residents of Clark County. In addition to affordable housing, the VHA's community development activities also shape the lives of the people and neighborhoods we serve.

The VHA was among the original group selected to participate in Moving to Work (MTW) in 1999. The current Moving to Work Agreement between the Department of Housing and Urban Development (HUD) and the VHA has been extended until 2028.

The MTW program provides the VHA the opportunity to design and test innovative, locally-designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families. As a MTW Agency, the VHA receives exemptions from many program rules and more flexibility regarding the use of Federal funds.

The Moving to Work Statutory Objectives:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures
- ❖ Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient
- Increase housing choices for low-income families

Each year the VHA prepares an annual report as required under the MTW agreement in order to report on the outcomes of our participation in the MTW demonstration.

SHORT AND LONG-TERM MTW GOALS AND OBJECTIVES

VHA's initial Plan for 2019 proposed five new Public Housing projects, four of which are still in process toward approval or completion of construction. We expect three of these four projects, Elwood, Englund Manor, and Arbor Ridge to be completed in 2020 and Tenny Creek to be completed in 2021. The 2019 Plan included a MTW Activity, Blended Subsidy, re-submitted for HUD approval in order to include two of these new projects, Tenny Creek, and Englund Manor.

VHA also submitted a new MTW Activity in the 2019 Plan that required tenants at Caples Terrace to participate in the self-sufficiency program offered there. Caples Terrace is a new Public Housing project built on the site of the old VHA administrative building and was completed and leased up in 2019. The project uses a local preference on the waiting list for young adults transitioning out of foster care and also one for homeless unaccompanied youth.

VHA also leased up two new Project-Based projects in 2019, Isabella II and the Rhododendron. Both projects have units set aside for the homeless.

In all, 2019 was a busy year for VHA with a large number of new projects in the pipeline and the ongoing challenges of funding, the rapidly rising rental market, and the increase in the number of homeless.

SECTION II: GENERAL OPERATING INFORMATION

A. HOUSING STOCK INFORMATION

i. Actual New Project Based Vouchers

PROPERTY NAME	NUMBER OF VOUCHERS NEWLY PROJECT-BASED		STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
	Planned	Actual			
Isabella Court II	30	30	Leased/Issued	No	A 49 unit project owned by Reach Community Development
Rhododendron Place	30	23	Leased/Issued	No	A 30 unit project owned by Columbia Non Profit Housing
_	60	53	Planned/Actual Total Vouchars Nawly Project-Based		

Please describe differences between the Planned and Actual Number of Vouchers Newly Project-Based:

Seven units at Rhododendron are not set aside for homeless very-low income residents. The initial assumption of all 30 units to be PBV was in error.

ii. Actual Existing Project Based Vouchers

PROPERTY NAME	NUMBER OF BASED VO		STATUS AT END OF PLAN YEAR	RAD ?	DESCRIPTION OF PROJECT
	Planned	Actual	ILAK		
Camas Ridge	8	8	Leased/Issued	No	A 58 unit market rate project
Van Vista	96	96	Leased/Issued	No	96 units, previously public housing
Vista Court	76	76	Leased/Issued	No	76 unit senior building
Cascadia Village	6	6	Leased/Issued	No	51 unit LIHTC owned by Reach CDC
The Mews	3	3	Leased/Issued	No	24 unit LIHTC owned by Reach CDC
Central Park Place	30	30	Leased/Issued	No	30 VASH PBV in 124 unit SRO
VHA Apartment Homes	122	122	Leased/Issued	Yes	Scattered small complexes
Skyline Crest	90	90	Leased/Issued	No	Previously public housing
Skyline Crest	48	48	Leased/Issued	Yes	RAD portion of previous public housing
Mill Creek	12	12	Leased/Issued	Yes	50 unit LIHTC, RAD transfer
Fruit Valley	30	30	Leased/Issued	No	Previously public housing
Arbor Ridge	30	30	Leased/Issued	Yes	60 unit assisted living, RAD transfer
Lincoln Place	30	30	Leased/Issued	No	30 unit site for chronic homeless
Smith Tower	3	3	Leased Issued	No	170 units, owned by Mid-Columbia
Freedom's Path	40	40	Leased/Issued	No	40 VASH PBV in 50 unit building
Isabella Court	10	10	Leased/Issued	No	49 unit LIHTC, Reach CDC
Meriwether Place	15	15	Leased/Issued	No	30 unit LIHTC, CNPH
The Meadows	23	23	Leased/Issued	No	30 unit LIHTC, 2 nd Step Housing
	672	672	Planned/Actual Total Existing Project-Based Vouchers		

Please describe differences between the Planned and Actual Existing Number of Vouchers Project-Based:

Not Applicable

iii. Actual Other Changes to MTW Housing Stock in the Plan Year

ACTUAL OTHER CHANGES TO MTW HOUSING STOCK IN THE PLAN YEAR

VHA leased up Caples Terrace during the plan year, a 28 unit new construction public housing project.

iv. General Description of All Actual Capital Expenditures During the Plan Year

GENERAL DESCRIPTION OF ALL ACTUAL CAPITAL EXPENDITURES DURING THE PLAN YEAR

VHA stated in the 2019 Plan that we were planning to use 1.6 million in DDTF funds for renovations to Columbia House. However, that project has been delayed and is now expected to begin in March 2020. VHA did have capital expenditures of \$146,256.94 for a former public housing project (now PBV under RAD) on 132nd Avenue. We also spent \$216,277.54 in DDTF funds for the Tenny Creek project.

B. LEASING INFORMATION

i. Actual Number of Households Served

NUMBER OF HOUSEHOLDS SERVED THROUGH:	NUMBER OF UNIT MONTHS OCCUPIED/LEASED		NUMBER OF HOUSEHOLDS SERVED	
	Planned^^	Actual	Planned^^	Actual
MTW Public Housing Units Leased	168	87	14	7
MTW Housing Choice Vouchers (HCV) Utilized	26,400	25,016	2200	2085
Local, Non-Traditional: Tenant-Based	360	288	30	24
Local, Non-Traditional: Property-Based	144	na	12	na
Local, Non-Traditional: Homeownership	0	0	0	0
Planned/Actual Totals	27072	25391	2256	2116

Please describe any differences between the planned and actual households served:

The planned public housing units were based on an anticipated date of Caples Terrace being ready for occupancy. The actual opening date was a little later in the year. The building was fully occupied by the end of the year. HCV Leasing continues to be a challenge due to rising costs. In addition, VHA received awards of more Mainstream, FUP and VASH vouchers (not MTW and not included here) in 2019, That leasing activity affected MTW leasing.

LOCAL, NON- TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	MON	NUMBER OF UNIT MONTHS OCCUPIED/LEASED		NUMBER OF HOUSEHOLDS TO BE SERVED	
OATEGORI		Planned Actual		Planned	Actual	
Tenant-Based	School Stability/2013-02	360	288	30	24	
Property-Based	Second Step/2014-04	144	na	12	na	
Homeownership	None	0	0	0	0	
	Planned/Actual Totals	504	288	42	24	

HOUSEHOLDS RECEIVING LOCAL, NON-TRADITIONAL SERVICES ONLY	AVERAGE NUMBER OF HOUSEHOLDS PER MONTH	TOTAL NUMBER OF HOUSEHOLDS IN THE PLAN YEAR
None	NA	NA

ii. Discussion of Any Actual Issues/Solutions Related to Leasing

Discussion of any actual issues and solutions utilized in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ACTUAL LEASING ISSUES AND SOLUTIONS
MTW Public Housing	VHA opened a new 28 unit public housing project in August 2019. Caples Terrace has a local preference on a site-based wait list for youth transitioning out of foster care and homeless unaccompanied youth. The project was fully leased by the end of the year
MTW Housing Choice Voucher	Rents and HAP expense continue to rapidly increase in Vancouver. Although some recent market studies show rents stabilizing and even going down in Portland (with whom we share the MSA) one study shows rents up over 7% in parts of Vancouver and another reports rents were up 5% over 2018 for all of Clark County. The average HAP for MTW vouchers (minus the RAD units) went from \$659 in January 2019 to \$728 in December; a 10% increase. Funding issues aside, new voucher holders did better in 2019 with 84% of MTW vouchers issued leasing successfully.
Local, Non-Traditional	No leasing issues were reported in the local non-traditional programs,

C. WAITING LIST INFORMATION

i. Actual Waiting List Information

Snapshot information on the actual status of MTW waiting lists at the end of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
Housing Choice Voucher	Tenant-Based Voucher	957	Partially Open	No
Camas Ridge	PBV Site	4593	Open	No
Van Vista	PBV Site	2332	Open	No
Vista Court	PBV Site	947	Partially Open	No
VHA Apartment Homes	PBV Site	4884	Open	No
Skyline Crest	PBV Site	5535	Open	No
Mill Creek	PBV Site	6075	Open	No
Fruit Valley	PBV Site	5005	Open	No
Isabella Court	PBV Site	1726	Open	No
The Meadows	PBV Site	2454	Open	No
Meriwether Place	PBV Site	13	Partially Open	No
Rhododendron	PBV Site	4	Partially Open	Yes
Caples Terrace	Public Housing Site	19	Partially Open	Yes
Englund Manor	Public Housing Site	0	Closed	No
The Elwood	Public Housing Site	0	Closed	No
Central Park Place	Public Housing Site	0	Closed	No

Please describe any duplication of applicants across waiting lists:

As of the end of the plan year there were a total of 34,544 active applications from 11,320 applicants.

ii. Actual Changes to Waiting List in the Plan Year

WAITING LIST NAME	DESCRIPTION OF ACTUAL CHANGES TO WAITING LIST
Housing Choice Voucher	A local preference for Mainstream eligible applicants was added in 2019
Rhododendron	This new PBV site opened in September 2019
Caples Terrace	This new public housing site opened in August 2019
Englund Manor	This new public housing site and waiting list will open in 2020
The Elwood	This new public housing site and waiting list will open in 2020
Central Park Place	This new public housing site and waiting list will open in 2020

D.INFORMATION ON STATUTORY OBJECTIVES AND REQUIREMENTS

i. 75% of Families Assisted Are Very Low Income

INCOME LEVEL	NUMBER OF LOCAL, NON-TRADITIONAL HOUSEHOLDS ADMITTED IN THE PLAN YEAR
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	7

Total Local, Non-Traditional Households Admitted	7
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ii. Maintain Comparable Mix

	BASELINE MIX OF FAMILY SIZES SERVED (upon entry to MTW)						
FAMILY SIZE	OCCUPIED PUBLIC HOUSING UNITS	UTILIZED HCVs	NON-MTW ADJUSTMENTS*	BASELINE MIX NUMBER	BASELINE MIX PERCENTAGE		
1 Person	117	804	60	981	41%		
2 Person	145	440	0	585	25%		
3 Person	111	254	0	365	15%		
4 Person	64	172	0	236	10%		
5 Person	18	93	0	111	5%		
6+ Person	29	81	0	110	5%		
TOTAL	484	1844	60	2388	100%		

Please describe the justification for any "Non-MTW Adjustments" given above:

60 assisted living units that should have been included in the 2007 Public Housing data were added in 2012.

	MIX OF FAMILY SIZES SERVED (in Plan Year)						
FAMILY SIZE	BASELINE MIX PERCENTAGE	NUMBER OF HOUSEHOLDS SERVED IN PLAN YEAR	PERCENTAGE OF HOUSEHOLDS SERVED IN PLAN YEAR	PERCENTAGE CHANGE FROM BASELINE YEAR TO CURRENT PLAN YEAR			
1 Person	41%	1160	53%	29%			
2 Person	25%	479	22%	-12%			
3 Person	15%	227	10%	-34%			
4 Person	10%	150	7%	-30%			
5 Person	5%	93	4%	-20%			
6+ Person	5%	88	4%	-20%			
TOTAL	100%	2197	100%	0%			

Please describe the justification for any variances of more than 5% between the Plan Year and Baseline Year:

The trend toward more single person and smaller households has been ongoing for some time and is experienced by other non-MTW agencies as well. It appears to reflect changes in the population overall, as well as VHA's community directed focus on homeless and disabled persons and not any specific MTW activity.

iii. Number of Households Transitioned to Self-Sufficiency in the Plan Year

MTW ACTIVITY NAME/NUMBER	NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY	MTW PHA LOCAL DEFINITION OF SELF SUFFICIENCY
FSS Lite/2016-01	0	Obtained employment or transferred to full FSS
Second Step/2014-04	na	Successful program exit to stable housing
Modified FSS Escrow/2014-01	13	Successful exit from subsidized housing
School Stability Subsidy/2013-02	1	Maintain stable housing after program exit
Minimum Income/2013-01	117	Positive exit from subsidized housing
Skyline Campus/2010-02	6	On-time graduation
	13	(Households Dunlicated Across MTW Activities)

124 Total Households Transitioned to Self Sufficiency

SECTION III: PROPOSED MTW ACTIVITIES

All proposed MTW Activities that were granted approval by HUD are reported in Section IV as "Approved Activities".

SECTION IV: APPROVED MTW ACTIVITIES

A. IMPLEMENTED ACTIVITIES

Activity 2019-01: Mandatory Participation in Services at Caples Terrace

i. Plan Year Approved, Implemented, Amended

This activity was approved in the FY2019 MTW Annual Plan and was implemented in the fall of 2019 as Caples Terrace leased up after construction was completed. It has not been amended since initial approval.

ii. Description/Impact/Update

This activity requires residents of Caples Terrace to participate in the service component provided there. Caples Terrace is a mixed finance development with a preference for youth transitioning out of foster care and a second preference for homeless unaccompanied youth. Services are provided for residents to assist their transition to self-sufficiency. If a resident fails to participate in these services, VHA will cancel their income-based rent and require the participant to begin paying the flat rent for the unit if they wish to continue living there. The resident may continue to rent the unit provided they remain in compliance with the other requirements of the lease.

Bridgeview Non-Profit is the service coordinator and provides residents a self-sufficiency program modeled on the VHA FSS Lite program. The program includes assessment, goal planning and linkage to other service providers including mental and physical health, employment, education and training, financial management and Independent Living Skills Case Management as necessary. Residents have the opportunity to earn escrow as structured in the current FSS Lite program.

Outcomes for this activity are tracked using the following metrics:

SS #1: Increase in Household Income						
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?		
Average earned income of households.	\$3,941	\$	\$3,941	Yes		

SS #2: Increase in Household Savings						
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?		
Average amount of savings/escrow.	\$183	\$	\$183	Yes		

SS #3: Increase in Positive Outcomes in Employment Status						
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?		
(1) Employed Full-	2	9	4	No		
Time	7%	32%	14%	No		
(2) Employed Part-	9	15	9	No		
Time	32%	54%	32%	No		
(3) Enrolled in an	7	15	7	No		
Educational Program	25%	54%	25%	No		

SS #3: Increase in Positive Outcomes in Employment Status						
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?		
(4) Enrolled in Job	2	8	2	No		
Training Program	7%	29%	7%	No		
5) IIl	15	4	15	No		
5) Unemployed	54%	14%	54%	No		

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Number of households					
receiving TANF	5	2	5	No	
assistance (decrease).					

SS #5: Households Assisted by Services that Increase Self Sufficiency					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Number of households	0	28	28	Yes	
receiving services.	U	20	20	ies	

SS #6: Reducing Per Unit Subsidy Costs for Participating Households					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Average amount of Section 8 subsidy.	\$291*	\$250	\$291	No	

SS #7: Increase in Agency Rental Revenue					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total Household					
contributions towards	\$7,413	\$9000	\$6,659	No	
housing assistance.					

SS #8: Households Transitioned to Self Sufficiency						
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?		
Number of households						
transitioned to self-	0	2	0	No		
sufficiency (increase).						

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

As the project was only leased up toward the end of the year, it is too early to say what challenges we will have as things develop. Benchmarks are anticipated to be met after one year. This is VHA's first project with this type of population and we expect there will be challenges and adjustments in the future.

Activity 2018-02: Local Payment Standards

i. Plan Year Approved, Implemented, Amended

This activity was approved in an amendment to the FY2018 MTW Annual Plan and was implemented January 1, 2018. It has not been amended since initial approval.

ii. Description/Impact/Update

This activity allows the VHA to set payment standards outside of the normal range allowed under regulation. VHA monitors rent burdens and other factors such as voucher success rates, lease-up time, market rents, vacancy rates and funding availability and sets payment standards within a range between 80 and 120 percent of the HUD published FMR. In recent years rents charged in our local rental market have been rapidly increasing. HUD FMRs have not always kept up and the VHA has used the appeal process to submit local market studies. This has sometimes resulted in adjustments to the FMR as high as 28%. In 2018 VHA utilized this activity and allowed some payment standards to fall below 90% of FMR (note the payment standards were not changed, a revision in the FMR caused them to drop from 100% of the previous FMR). VHA was able to revise all payment standards to fall above 90% of FMR for the 2019 Plan Year.

Outcomes for this activity are tracked using the following metrics:

CE #1: Agency Cost Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total cost of task in dollars (decrease).	\$142,326	\$0	\$0	Yes	

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Total time to complete				
task in staff hours	20	20	0	Yes
(decrease).				

HC #5: Increase in Resident Mobility				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Number of households able to move.	194	200	271	Yes

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

This activity was not utilized for 2019, however it will likely be utilized throughout the 2020 Plan year.

Activity 2016-01: Family Self-Sufficiency Lite

i. Plan Year Approved, Implemented, Amended

This activity was approved in the FY2016 MTW Annual Plan and was implemented on April 1, 2016. It has not been amended since initial approval.

ii. Description/Impact/Update

VHA offers a shorter version of the Family Self-Sufficiency (FSS) program in addition to the traditional five-year FSS program. This shorter version of the FSS program is not meant to replace the traditional program nor is it intended to siphon any potential applicants from that program. Rather it is aimed at those households that have an interest in increasing self-sufficiency but are reluctant to commit to the full five-year FSS program. This version has a much shorter commitment of two years, limits escrow to a maximum of \$2000 and does not offer contract extensions, but does allow conversion to the full FFS program if requested during the term of the FSS Lite contract. This activity will be ongoing during the Plan year.

Outcomes for this activity are tracked using the following metrics:

SS #1: Increase in Household Income					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Average earned income of households.	\$11,440	\$12.440	\$11,507	No	

SS #2: Increase in Household Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Average amount of savings/escrow.	\$0	\$0	\$1000	Yes	

SS #3: Increase in Positive Outcomes in Employment Status					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
(1) Employed Full-	0	1	0	No	
Time	0%	5%	0%	No	
(2) Employed Part-	1	3	0	No	
Time	6%	15%	0%	No	
(3) Enrolled in an	1	3	0	No	
Educational Program	6%	15%	0%	No	
(4) Enrolled in Job	1	3	0	No	
Training Program	6%	15%	0%	No	
5) II	13	10	2	No	
5) Unemployed	81%	50%	100%	No	

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Number of households				
receiving TANF	2	1	1	Yes
assistance (decrease).				

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Number of households receiving services.	0	20	2	No

SS #6: Reducing Per Unit Subsidy Costs for Participating Households					
Unit of Measurement Baseline Benchmark 2019 Outcome Benchmark Achieved?					
Average amount of Section 8 subsidy.	\$845	\$745	\$752	No	

SS #7: Increase in Agency Rental Revenue					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total Household					
contributions towards	\$107	\$150	\$362	Yes	
housing assistance.					

SS #8: Households Transitioned to Self Sufficiency					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Number of households					
transitioned to self-	0	0	0	Yes	
sufficiency (increase).					

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

Although many benchmarks for this activity were not met, it was primarily due to there only being two current participants enrolled. Most previous participants have switched to the full version of FSS. In addition, most new participants make the switch as well shortly after signing up for FSS lite. The activity appears to be serving mostly as a recruitment tool for FSS, We will evaluate whether to continue this activity in 2020.

Activity 2015-02: Alternative TTP Calculation (35%)

Plan Year Approved, Implemented, Amended

This activity was approved in the FY2015 MTW Annual Plan and was implemented on November 1, 2015. It was changed to the current calculation using 35% of adjusted income from 33% in an amendment to the FY2017 Annual Plan. The new calculation was implemented on January 1, 2018.

ii. Description/Impact/Update

This MTW activity changes the way in which the Total Tenant Payment (TTP) is calculated when determining tenant rent and housing assistance in the HCV and Public Housing programs. The TTP is normally determined by taking the highest of: 1) 30% of the household's monthly adjusted income; 2) 10% of the household's monthly income; or 3) The minimum rent of \$50. Under this activity VHA has changed the percentage of adjusted monthly income to 35% resulting in a higher TTP for almost all MTW households. Also under this activity, households with a tenant-based voucher are allowed to have a maximum family share of up to 50% of the family's adjusted monthly income at initial occupancy, an increase over the 40% maximum family share allowed under regulation.

Outcomes for this activity are tracked using the following metrics:

CE #1: Agency Cost Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total cost of task in dollars (decrease).	\$18,944,340	\$18,094,340	\$16,226,771	Yes	

CE #5: Increase in Agency Rental Revenue					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total Household					
contributions towards	\$ O	\$0	\$19,532	No	
housing assistance.					

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Number of new housing				
units made available	0	120	349	Yes
(increase).				

HC #3: Decrease in Wait List Time				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Average applicant time				
on wait list in months	102	102	22	Yes
(decrease).				

In 2019 VHA received 38 hardship requests asking to be exempt from this policy. One was approved for a long-term exemption and another eight for a short-term exemption. The remaining requests were found to be either ineligible (15 cases where the hardship was caused by other issues) or that no hardship existed in 14 cases.

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

For CE #5 the VHA is reporting rent revenue from the opening of our first public housing project since all of our remaining previous public housing was converted under RAD. We will need to set a new benchmark for rent revenue once our other proposed public housing projects are approved and opened.

Activity 2014-06 Alternative Project-Based Voucher Program

i. Plan Year Approved, Implemented, Amended

This activity was approved in amendment to the FY2014 MTW Annual Plan and was implemented on August 6, 2014. It was resubmitted for approval in the FY2017 Annual Plan to allow VHA to change the limit on project-basing from 20% to 30% of the HCV program.

ii. Description/Impact/Update

This activity consolidated some previous MTW activities and added some new policies with regard to Project-Based Vouchers (PBV). VHA's Alternative PBV program utilizes the existing regulations under 24 CFR § 983 with the following exemptions:

- The required competitive bidding process is waived when VHA is placing PBV in a project owned by the VHA or a closely affiliated organization.
- The VHA will not provide move vouchers except in cases of overcrowded or under-occupied units where VHA does not anticipate an appropriate sized PBV becoming available. VHA also will provide a move voucher when requested in PBV projects that include services and when the tenant has resided there for at least two years, no longer has a need for the provided services, and has a recommendation from the service provider. Note that PBV projects converted under RAD also allow for move vouchers per RAD requirements.
- The requirement that tenants be selected from a waiting list may be waived for projects where participation in specific services is a requirement of residency.
- VHA may allow up to 100% of the units in a project to be PBV even when the project is not exclusively for elderly or disabled households or when no services are required.
- For VHA owned units VHA will not use an independent entity for: inspections, determination of rent to owner and rent reasonableness, and the initial and renewal approval of the HAP contract term.
- VHA may project-base up to 30% of its HCV program.

Outcomes for this activity are tracked using the following metrics:

CE #1: Agency Cost Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total cost of task in dollars (decrease).	\$3119	\$0	\$0	Yes	

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Total time to complete the task in staff hours.	103	0	0	Yes

CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Average error rate in completing a task as a	NA	NA	NA	NA
percentage.				

HC #3: Decrease in Wait List Time				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	46	46	22	Yes

HC #4: Displacement Prevention					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Number of households that would lose assistance or need to move (decrease).	NA	NA	NA	NA	

iii. Actual Non-Significant Changes

VHA has included the waiver of the independent entity requirement to cover the expanded requirements under HOTMA for approvals of HAP contract terms and extensions.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

The benchmarks were met and this activity will continue.

Activity 2014-05: Interim Verification Policy

i. Plan Year Approved, Implemented, Amended

This activity was approved under an amendment to the FY2014 MTW Annual Plan and was implemented on September 1, 2014. It has not been amended since the initial approval.

ii. Description/Impact/Update

This activity changes the way interim reexaminations for changes in family income and composition are verified and their effective dates. Households may still request an interim reexamination at any time but the responsibility to obtain verification is changed from

VHA to the participant. Verification of the income or family change that they are reporting must be provided prior to any resulting change in tenant rent becoming effective. If the request *and* the verification is received before the 15th of the month, any resulting change in tenant rent will be effective the first of the following month. The VHA still obtains verification for initial eligibility reexaminations and for regular/annual reexaminations.

Outcomes for this activity are tracked using the following metrics:

CE #1: Agency Cost Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total cost of task in	\$1317	\$52	\$0	Yes	
dollars (decrease).	\$1317	₽9 2	ФU	ies	

CE #2: Staff Time Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total time to complete the task in staff hours.	40	2	0	Yes	

CE #3: Decrease in Error Rate of Task Execution					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Average error rate in completing a task as a percentage.	10.55%	0%	0%	Yes	

CE #5: Increase in Agency Rental Revenue					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total Household					
contributions towards	\$289	\$289	\$396	Yes	
housing assistance.					

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

There were no challenges in meeting benchmarks for this activity.

Activity 2014-04: Second Step Transitional Housing Program

i. Plan Year Approved, Implemented, Amended

This activity was approved under an amendment to the FY2014 MTW Annual Plan and was implemented on July 1, 2014. It has not been amended since the initial approval.

ii. Description/Impact/Update

The Second Step Transitional Housing Program is a program for homeless individuals and families with income below 30% of the Area Median Income (AMI). This is a local nontraditional housing subsidy program where VHA provides funding of up to \$80,000 annually in housing assistance to a local non-profit; Second Step Housing. Second Step Housing utilizes 12 large group homes for this program. They have a capacity of about 35 individuals and families at one time. Tenants must be homeless at admission, income eligible and willing to participate in case management, classes, and shared living. Utilities are provided and tenants pay 30% of their adjusted income for rent. Calculation of income for eligibility and rent is done in compliance with the regulations found at 24 CFR § 5.609. All housing units are alcohol and drug free. The maximum length of stay in the program is two years.

Outcomes for this activity are tracked using the following metrics:

CE #4: Increase in Resources Leveraged				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars.	\$0	\$90,000	Not Available	No

SS #1: Increase in Household Income				
Unit of Measurement Baseline Benchmark 2019 Outcome Benchmark Achieve				Benchmark Achieved?
Average earned income of households.	\$12,600	\$12,600	Not Available	No

SS #3: Increase in Positive Outcomes in Employment Status					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
(1) Employed Full-	5	5	NA	No	
Time	15%	15%	NA	No	
(2) Employed Part-	17	17	NA	No	
Time	50%	50%	NA	No	
(3) Enrolled in an	6	6	NA	No	
Educational Program	18%	18%	NA	No	
(4) Enrolled in Job	2	2	NA	No	
Training Program	5%	5%	NA	No	
E) Unamplayed	4	4	NA	No	
5) Unemployed	12%	12%	NA	No	

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Number of households receiving TANF.	6	6	NA	No	

SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement Baseline Benchmark 2019 Outcome Benchmark Achieved				
Average amount of local subsidy.	\$183	\$183	NA	No

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Number of households transitioned to self- sufficiency (increase).	0	10	NA	No

HC #3: Decrease in Wait List Time				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	102	0	NA	No

HC #4: Displacement Prevention				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Number of households that would lose assistance or need to move (decrease).	35	0	NA	No

HC #5: Increase in Resident Mobility				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Number of households able to move.	0	5	NA	No

The agency that operates this program did not submit any outcome data. We have been unable to reach them to address the issue, likely due to the current health emergency.

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

Outcomes will be reported for this activity as soon as they are received by the VHA.

Activity 2014-01: Modified FSS Escrow Calculation

i. Plan Year Approved, Implemented, Amended

This activity was approved in the FY2014 MTW Annual Plan and was implemented on January 1, 2014. It has not been amended since the initial approval.

ii. Description/Impact/Update

This activity modifies the way escrow is calculated in the full, five-year, Family Self-Sufficiency Program (FSS). VHA's method under MTW has two parts. The first part is a monthly deposit to a participants escrow account when they have increased earned income that results in a Total Tenant Payment (TTP) over the baseline set when they join FSS. The baseline is a fixed amount set at \$450 for all new participants regardless of their income. The second part is that VHA pays a specific amount to a participant's escrow account based on specific achievements. Some of these "pay points" result in an immediate

deposit to the escrow account while others are not calculated and paid until a successful program graduation. Examples of achievements that result in escrow deposits include:

- a. Completion of core GOALS classes or entire curriculum
- b. Completion of other educational goals
- c. Obtaining and maintaining employment
- d. Increase in credit score
- e. Establishing and maintaining a saving account
- f. Completion of other ITSP goals

The maximum allowable that a participant may earn under pay points is \$6,000. There is no limit set on the amount a participant may earn under the increased earned income part of the escrow calculation. Under this new system FSS participants are only eligible for one interim withdrawal from their escrow account during their program participation.

Outcomes for this activity are tracked using the following metrics:

SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Average earned income of households.	\$17.870	\$10,000	\$11,461	Yes

SS #2: Increase in Household Savings				
Unit of Measurement Baseline Benchmark 2019 Outcome Benchmark Achieved?				
Average amount of savings/escrow.	\$3,600	\$2,000	\$5,125	Yes

SS #3: Increase in Positive Outcomes in Employment Status					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
(1) Employed Full-	38	42	88	Yes	
Time	39%	50%	52%	Yes	
(2) Employed Part-	18	18	33	Yes	
Time	19%	22%	19%	Yes	
(3) Enrolled in an	19	19	16	No	
Educational Program	19%	23%	9%	No	
(4) Enrolled in Job	24	49	16	No	
Training Program	25%	58%	9%	No	
5) Unemployed	22	27	19	Yes	
5) Unemployed	23%	32%	11%	Yes	

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Number of households receiving TANF.	8	6	3	Yes	

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Number of households receiving services.	96	100	168	Yes

SS #6: Reducing Per Unit Subsidy Costs for Participating Households					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Average amount of subsidy per household.	\$633	\$633	\$620	Yes	

SS #7: Increase in Agency Rental Revenue				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Total Household contributions towards housing assistance.	\$279	\$279	\$584	Yes

SS #8: Households Transitioned to Self Sufficiency					
Unit of Measurement Baseline Benchmark 2019 Outcome Benchmark Achieve					
Number of households					
transitioned to self-	5	8	13	Yes	
sufficiency (increase).					

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

Benchmarks were met or exceeded for the most part in 2019. The number of those transitioned to self-sufficiency continues to be high.

Activity 2013-02: School Stability Subsidy Program

i. Plan Year Approved, Implemented, Amended

This activity was approved as part of an amendment to the FY2013 MTW Annual Plan. It was implemented April 1, 2015.

ii. Description/Impact/Update

This is a local non-traditional rental subsidy program in partnership with Family Resource Centers (FRC) at selected local schools and a local agency serving the homeless. Families with a student enrolled in the partnering school, and who are either homeless or at risk of homelessness, are selected for participation in the program in order to prevent them from having to relocate outside of the school district. The subsidy allows the family to remain in the same school district providing needed stability for the student. During their time on the program the family must participate in ongoing economic self-sufficiency meetings provided by the VHA and educational planning meetings provided by the partnering agencies.

In 2018 VHA began leasing families under a revised version of this activities funded by local funds rather than MTW funding. This second cohort uses a shorter term of a half years (30 months) and a subsidy of 70% of the payment standard for the first six months, 60% for one year, and goes to 30% of the payment standard for the final year of

participation. In 2019 this second cohort was rolled into the MTW activity as the first group either transitioned to self-sufficiency or their time expired.

Outcomes for this activity are tracked using the following metrics:

CE #4: Increase in Resources Leveraged				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	\$0	\$33,680	\$15,114	No

SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	\$14,787	\$14,787	\$28,562	Yes

SS #3: Increase in Positive Outcomes in Employment Status					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
(1) Employed Full-	5	5	20	Yes	
Time	26%	26%	57%	Yes	
(2) Employed Part-	3	3	5	Yes	
Time	16%	16%	14%	No	
(3) Enrolled in an	0	0	2	Yes	
Educational Program	0%	0%	6%	Yes	
(4) Enrolled in Job	7	7	3	No	
Training Program	37%	37%	9%	No	
E) IIld	4	4	5	No	
5) Unemployed	21%	21%	14%	Yes	

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Number of households				
receiving TANF	3	3	6	No
assistance (decrease).				

SS #6: Reducing Per Unit Subsidy Costs for Participating Households					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Average amount of					
Local subsidy per	\$789	\$789	\$662	Yes	
household affected by	\$189	\$169	\$662	res	
this policy in dollars.					

SS #7: Increase in Agency Rental Revenue				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Total Household contributions towards housing assistance (increase).	\$262	\$262	\$1252	Yes

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency.	0	0	1	Yes

HC #3: Decrease in Wait List Time				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	2	0	0	Yes

HC #4: Displacement Prevention				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Number of households				
that would lose	12	12	38	Yes
assistance (decrease).				

HC #7: Households Assisted by Services that Increase Housing Choice				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Number of households				
receiving services	12	12	38	Yes
(increase).				

Most benchmarks were exceeded this year with an especially notable increases in the number of households with employment along with their increased income and rent share.

iii. Actual Non-Significant Changes

Non-significant changes to this activity was an expansion of the program size through merging a second similar program that had been locally funded in the MTW version. This new cohort has a slightly different rent schedule and ramp down of assistance.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

Achieving benchmarks was not a challenge and this activity will continue.

Activity 2013-01: Minimum Earned Income Rent Reform

i. Plan Year Approved, Implemented, Amended

This activity was initially approved in the FY2013 MTW Annual Plan. It was re-proposed in the FY2017 MTW Annual Plan for an increase in the amount of the annual minimum income from \$9,000 to \$10,000. Later, it was re-proposed in amendment to the FY2017 Plan and changed to link the amount of the minimum income directly to the Washington State minimum wage. It was again re-proposed in the FY2018 MTW Annual Plan to change from a minimum income to a minimum *earned* income. This change to a minimum earned income was implemented August 1, 2018.

ii. Description/Impact/Update

This activity utilizes a minimum earned income when calculating rent for any MTW household that contains one or more work-able family members. Work-able is defined as an adult under the age of 62 who is not disabled, a dependent, or a full-time caretaker for a disabled household member. The minimum earned income amount is based on the Washington State minimum wage at 20 hours per week. This amount is applied for each work-able member. For example, a household with one work-able member has a minimum earned income based 20 hours per week at the current minimum wage; a household with two workable members has a minimum earned income twice that, and so on. If the household's actual annual earned income, as determined under the program regulations, falls below the minimum, tenant rent and housing assistance is calculated using the minimum in addition to any other included income type in the household. If the household's actual earned income is greater than the minimum, the actual earned income is used and the minimum earned income is not a factor. A household subject to the minimum still has any deductions they might be eligible for under HUD regulations or VHA policy.

Outcomes for this activity are tracked using the following metrics:

CE #1: Agency Cost Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
HAP Savings Imputed	\$0	\$500,000	\$1,458,576	Yes	
from Minimum Income	ΦО	\$500,000	\$1,450,576	ies	

SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	\$15,653	\$16,000	\$23,695	Yes

SS #3: Increase in Positive Outcomes in Employment Status					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
(1) Employed Full-	201	300	244	No	
Time	24%	31%	23%	No	
(2) Employed Part-	300	250	370	Yes	
Time	36%	26%	36%	Yes	
(3) Enrolled in an	11	10	13	Yes	
Educational Program	1%	1%	1%	Yes	
(4) Enrolled in Job	15	10	7	Yes	
Training Program	2%	1%	1%	Yes	
5) Unemployed	303	400	408	No	
5) Onemployed	37%	41%	39%	No	

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Number of households					
receiving TANF	306	275	180	Yes	
assistance (decrease).					

SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Average amount of Section 8 subsidy per household affected by this policy in dollars.	\$665	\$650	\$742	No

SS #7: Increase in Agency Rental Revenue				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Average S8 Tenant Rent.	\$274	\$342	\$580	Yes

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Number of households				
transitioned to self-	89	89	115	Yes
sufficiency (increase).				

Agency Metric: Percentage of Work-Able Households With Earned Income					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Percentage of active					
households with one or	50.69%	53.00%	61.4%	Yes	
more Work-Able	50.69%	55.00%	61.4%	ies	
member/s working					

In 2019 VHA received 90 hardship requests asking to be exempt from this policy. One was approved for a long-term exemption and another 43 for a short-term exemption. The remaining requests were found to be either ineligible (6 cases where the hardship was caused by other issues) or that no hardship was found to exist (32 cases).

The annual reevaluation of this activity did not result in any recommended changes.

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes or modifications to the metrics for this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

This activity did not meet the benchmark for the count and percentage of full-time employed, however if you combine full-time employed with part-time employed the overall number employed is meeting expectations. We may need to revise the benchmark as it may be that full-time work is not as feasible as part-time for participants. We will also need to revise the benchmark for the per unit subsidy to reflect the rapidly rising cost of rent in our market.

Activity 2011-05: VHA Staff to Perform HQS and Rent Reasonableness on VHA Owned Properties.

i. Plan Year Approved, Implemented, Amended

This activity was approved in the FY2011 MTW Annual Plan and was implemented on January 1, 2011. It has not been amended since the initial approval.

ii. Description/Impact/Update

This MTW activity allows the VHA to have Section 8 HCV department staff perform HQS inspections and determine rent reasonableness for units owned by the VHA or owned by an entity substantially controlled by the VHA such as a tax credit property. This authority creates substantial savings compared to what the VHA was being charged by contracted inspectors.

Outcomes for this activity are tracked using the following metrics:

CE #1: Agency Cost Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total cost of task in dollars.	\$29,775	\$24,775	\$18,249	Yes	

CE #2: Staff Time Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total time to complete the task in staff hours.	0	461	362	Yes	

CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement Baseline Benchmark 2019 Outcome Benchmark Achieved?				
Average error rate.	15.71%	15.71%	13.75%	Yes

Agency Metric: Number of HQS Inspections of VHA Owned Property				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Number of Inspections completed of VHA owned units.	0	175	312	Yes

This activity met all the benchmarks this year. It continues to save VHA costs over the amounts charged when VHA used an outside entity for inspections even though the number of VHA owned units has grown since then.

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

Benchmarks were met and VHA continues to consider the activity effective.

Activity 2009-19: Special Admission Procedure for Assisted Living Facility

i. Plan Year Approved, Implemented, Amended

This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on September 1, 2009. It has not been amended since the initial approval.

ii. Description/Impact/Update

This MTW activity allows for tenant selection to be made by the administrator of the assisted living facility rather than the VHA maintaining a waiting list. Assisted Living programs at Van Vista and Arbor Ridge qualify applicants based on Medicaid requirements and suitability for the level of nursing care they are able to provide. The waiver of the waiting list requirement allows for the unique needs of the assisted living population and their need for services.

Outcomes for this activity are tracked using the following metrics:

CE #1: Agency Cost Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total cost of task in	\$1904	\$0	\$0	Yes	
dollars (decrease).	φ1904	φυ	φО	ies	

CE #2: Staff Time Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total time to complete the task in staff hours (decrease).	73.5	0	0	Yes	

HC #3: Decrease in Wait List Time					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Average applicant time on wait list in months (decrease).	9	0	0	Yes	

This activity saves VHA a modest amount in admin costs by not requiring the administration of a waiting list, but more importantly it is seen as necessary by the operators of assisted living and allows low-income persons additional housing choice.

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

Not applicable as the benchmarks were met.

Activity 2009-15: Owners Restricted to Annual Rent Increases

i. Plan Year Approved, Implemented, Amended

This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on September 1, 2009. It has not been amended since the initial approval.

ii. Description/Impact/Update

Under this MTW policy, property owners in the Housing Choice Voucher program are restricted to a single rent increase each year.

Outcomes for this activity are tracked using the following metrics:

CE #1: Agency Cost Savings						
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?		
Total cost of task in dollars (decrease).	\$49,313	\$46,847	\$45,695	Yes		

CE #2: Staff Time Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total time to complete	1.050	1.00	1.440	77	
the task in staff hours (decrease).	1672	1588	1449	Yes	

HC #4: Displacement Prevention					
Unit of Measurement	Baseline	Benchmark	2019Outcome	Benchmark Achieved?	
Number of households that would lose assistance or need to move (decrease).	156	148	135	Yes	

Agency Metric: Number of Rent Increase Denials Due to Policy					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Number of Denials Due to Less than Year Since Last Increase.	0	30	95	Yes	

This activity reduced the number of reexaminations due to a rent increase by 95 in 2019. This saved administrative time and cost as well as an unknown amount of housing assistance and tenant rent.

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

Benchmarks were met and the activity will be continued.

Activity 2009-13: Reset of Required Reexamination Date after Interim

i. Plan Year Approved, Implemented, Amended

This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on October 1, 2009. It has not been amended since the initial approval.

ii. Description/Impact/Update

This MTW activity provides that the next required reexamination (AKA Annual Review) will be rescheduled to at least 12 months after the effective date of an interim reexamination. This policy reduces the overall number of reexaminations required each year.

Outcomes for this activity are tracked using the following metrics:

CE #1: Agency Cost Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total cost of task in dollars (decrease).	\$27,989	0	0	Yes	

CE #2: Staff Time Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total time to complete					
the task in staff hours	763	0	0	Yes	
(decrease).					

This activity saves administrative cost and staff time through a reduction in the number of reexaminations that would otherwise be required during the plan year.

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

This activity continues to meet benchmarks and remains effective.

Activity 2009-10: Replacement of Medical Expense Deduction

i. Plan Year Approved, Implemented, Amended

This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on November 5, 2009. It has not been amended since the initial approval.

ii. Description/Impact/Update

Under this activity the VHA has eliminated individual calculation and verification of medical expenses for Elderly and Disabled designated families, replacing the deduction with an increase in the Elderly/Disabled deduction from \$400 to \$700.

Outcomes for this activity are tracked using the following metrics:

CE #1: Agency Cost Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total cost of task in dollars (decrease).	\$5,974	\$600	\$382	Yes	

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Total time to complete				
the task in staff hours	217	22	12	Yes
(decrease).				

CE #3: Decrease in Error Rate of Task Execution					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Average error rate in completing a task as a percentage.	10.31%	0%	0%	Yes	

VHA estimates a \$5592 savings in administrative costs, and a savings in staff time of 205 hours, in 2019 attributable to this activity.

VHA received three hardship requests regarding this policy in 2019. One was denied as no hardship was found and the other two were approved for an exemption to this policy and were both participants who were previously approved for long-term hardships.

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

This activity continues to meet benchmarks remains effective.

Activity 2009-08: Simplified Utility Allowance Schedule

i. Plan Year Approved, Implemented, Amended

This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on September 24, 2009. It has not been amended since the initial approval.

ii. Description/Impact/Update

VHA utilizes a simplified utility allowance schedule for tenant-based Housing Choice Vouchers. This provides households searching for a unit foreknowledge of their maximum rent and saves cost through a reduction in the number of denied Request for Lease Approvals. The schedule is based on the conventional HCV utilities schedules for newer energy efficient all electric units by bedroom size.

Outcomes for this activity are tracked using the following metrics:

CE #1: Agency Cost Savings					
Unit of Measurement Baseline Benchmark 2019 Outcome Benchmark Achieved					
Total cost of task in	\$7,603	\$0	\$0	Yes	
dollars (decrease).	φ <i>1</i> ,603	φО	φО	ies	

CE #2: Staff Time Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total time to complete					
the task in staff hours	194	0	0	Yes	
(decrease).					

CE #3: Decrease in Error Rate of Task Execution					
Unit of Measurement	Baseline	Benchmark	2019Outcome	Benchmark Achieved?	
Average error rate in					
completing a task as a	11.63%	0%	0%	Yes	
percent (decrease).					

Metrics for this activity are based on estimated staff time that used to be spent on Requests for Tenancy Approval forms that were denied in the past for exceeding maximum rent and estimates of time spent on additional instruction to landlords and tenants on calculating utility allowances that is no longer necessary under this activity.

This activity is a type of rent reform and participants are eligible to request a hardship exemption, however VHA received no requests for a hardship exemption from this policy in 2018.

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

Benchmarks were achieved and the activity was effective.

Activity 2009-03: No Verification of Assets Less Than \$50,000

i. Plan Year Approved, Implemented, Amended

This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on September 1, 2009. The dollar threshold was changed from \$5,000 to \$50,000 in an amendment to the FY2014 Annual Plan.

ii. Description/Impact/Update

VHA does not obtain a verification of a reported asset if the reported value is less than \$50,000. This MTW activity saves VHA significant administrative funds by eliminating verifications on the vast majority of participant held assets. Income from participant held assets, whether verified or not, is generally insignificant and has little or no effect on housing subsidy and/or tenant rent.

Outcomes for this activity are tracked using the following metrics:

CE #1: Agency Cost Savings					
Unit of Measurement Baseline Benchmark 2019 Outcome Benchmark Achieved?					
Total cost of task in dollars (decrease).	\$26,773	\$535	\$647	No	

CE #2: Staff Time Savings					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Total time to complete the task in staff hours (decrease).	854	17	2	Yes	

CE #3: Decrease in Error Rate of Task Execution					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Average error rate in					
completing task as	16.76%	0%	0%	Yes	
percent (decrease).					

Although the 2019 cost exceeds the benchmark slightly, this activity continues to save significant administrative cost and staff time. The higher cost in 2019 over previous years was due to a small number of new voucher admissions with assets requiring verification.

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies

Although one benchmark was not achieved in 2019, the outcome was still far below the baseline cost of verifying assets. If this continues in future years, it may require an adjustment to the benchmark.

Activity 2007-02: Alternate Required Reexamination Schedule

i. Plan Year Approved, Implemented, Amended

This activity was approved in the FY2007 MTW Annual Plan and was implemented on September 1, 2008. In an amendment to the FY2009 the policy was changed to the current schedule of triennial reexaminations for those on fixed income.

ii. Description/Impact/Update

VHA identifies households with a fixed income and places them on a schedule to have a full reexamination every three years rather than annually. Fixed income means the household has no work-able members and the only household income is from sources such as Social Security, Supplemental Security Income (SSI), and/or pensions. Households that are not determined to have a fixed income are scheduled to have a reexamination 12 months after their last reexamination.

Outcomes for this activity are tracked using the following metrics:

CE #1: Agency Cost Savings						
Unit of Measurement Baseline Benchmark 2019 Outcome Benchmark Achieved						
Total cost of task in	\$373.541	\$308.741	\$194,998	Yes		
dollars (decrease).	ф373,341	\$300,741	ф194,996	ies		

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	10234	8094	4995	Yes

CE #5: Increase in Agency Rental Revenue					
Unit of Measurement	Baseline	Benchmark	2019 Outcome	Benchmark Achieved?	
Rental revenue in dollars	\$0	\$0	\$0	Yes	

Benchmarks were met for this activity in 2019. This activity continues to save costs and staff time compared to the standard reexamination schedule.

iii. Actual Non-Significant Changes

There were no non-significant changes to this activity during the Plan year.

iv. Actual Changes to metrics/Data Collection

There were no actual changes or modifications to the metrics for this activity during the Plan year.

v. Actual Significant Changes

There were no significant changes to this activity during the Plan year.

vi. Challenges in Achieving Benchmarks and Possible Strategies
Benchmarks were achieved and the activity was effective.

B. NOT YET IMPLEMENTED ACTIVITIES

Activity 2016-02: Local Blended Subsidy

- i. This activity uses a blend of funding from both the Public Housing and Section 8 Voucher Programs in order to develop mixed-finance public housing projects. This activity was proposed in the FY2016 Annual Plan and approved by HUD. VHA intended to use this activity to develop Caples Terrace, a new public housing development on the site of the former VHA administrative offices. However that project was eventually developed without the use of blended subsidy.
- ii. This activity was resubmitted for approval in the FY2019 Plan for use at one new project, Tenny Creek, and three existing properties; Englund Manor, Arbor Ridge and Wisteria Manor. Tenny Creek is a planned 40 unit project that would provide assisted living supportive housing for individuals with chronic behavioral health/homelessness that have a diminished ability to live independently. Englund Manor is a 29 unit senior property owned by an affiliated non-profit. Arbor Ridge is a 60 unit assisted living facility owned by the VHA. VHA is planning to provide blended subsidy for 30 of the units. Wisteria Manor is a 24 unit senior property owned by the VHA that does not currently have any housing subsidy in place. As this report is being prepared in March 2020, VHA expects Englund to be approved and construction to begin on Tenny Creek shortly. Wisteria Manor is no longer being considered for public housing or blended subsidy.

Activity 2015-01: Rent Buy-Down Local Subsidy Program

- i. This activity was first approved in the FY2015 Plan Year. It allows VHA to create a local program that will "buy-down" rents at a market rate apartment property (not subsidized or receiving tax credits) so that the units become affordable for, and only available to, households at or below 50% of the Area Median Income (AMI). If selected, an owner would receive funds from the VHA to offset the amount the project would require to reduce apartment rents to reach the affordable level. This activity has not been implemented because VHA has not yet received a project proposal where this type of subsidy could be utilized. The original project where this activity was expected to be utilized did not end up being developed for reasons unrelated to this activity. Since then we have had interest from two other developers but their projects ended up receiving tax credits, or were targeted toward a population (homeless) that needs a deeper subsidy.
- ii. The Request for Proposals (RFP) for this activity remains open and VHA continues to expect that, for the right project, this subsidy will provide a new housing choice for local tenants.

C. ACTIVITIES ON HOLD

VHA does not currently have any activities on hold.

D. CLOSED OUT ACTIVITIES

The following chart lists all closed out MTW activities

The following chart lists all closed out M MTW ACTIVITY NAME/NUMBER	PLAN YEAR APPROVED	PLAN YEAR IMPLEMEN TED	PLAN YEAR CLOSED OUT	REASON CLOSED OUT
Skyline Crest Campus of Learners/2010-02	FY2010	FY2010	FY2019	Concluded
Community Supported Self Reliance/2012-01	FY2012	FY2012	FY2018	Concluded
Time Limited Vouchers with Services/2008-01	FY2008	FY2008	FY2018	Concluded
Local Rent Subsidy Program/2014-03	FY2014	NA	FY2014	Never Implemented
Utility Allowance Lesser of Unit/Voucher/2014-02	FY2014	FY2014	FY2015	Adopted by HUD
Health Advocate Training Program/2013-05	FY2013	FY2013	FY2013	Concluded
Admin Fee for Owners in HCV Program/2013-04	FY2013	NA	FY2013	Withdrawn
Shelter Facilities Support/2013-03	FY2013	NA	FY2014	Never Implemented
Short Term Rental Assistance/2012-04	FY2012	FY2013	FY2016	Concluded
Home Sharing in HCV Program/2012-03	FY2012	FY2015	FY2016	Concluded
MTW Fund for Leveraging Housing/2012-02	FY2012	NA	FY2017	Never Implemented
Allow up to 50% of HCV to be Project-based/2013-03	FY2011	NA	FY2014	Replaced by 2014-06
"Floating Units" in PBV program/2011-02	FY2011	FY2002	FY2013	Concluded
Income Limits for New Public Housing/2011-01	FY2011	NA	FY2011	Never Implemented
Local Preference for Unsubsidized/2010-04	FY2010	FY2010	FY2015	Concluded
Community Involvement/2010-01	FY2010	FY2010	FY2013	Concluded
Local Preference for FSS Participation/2009-18	FY2009	FY2009	FY 2009	NOFA Requirement
Mandatory Self-Sufficiency Program/2009-17	FY2009	NA	FY 2009	Never Implemented
Renter Education Required for Applicants/2009-16	FY2009	FY2009	FY 2017	Concluded
Simplified Recertification Process/2009-14	FY2009	NA	FY 2009	Never Implemented
Limited Utility Allowance Payments/2009-09	FY2009	FY2009	FY 2013	Concluded
Alternate Inspection Schedule in HCV/2009-06	FY2009	FY2010	FY 2015	Adopted by HUD
Asset Based Initiative (IDA)/2009-04	FY2009	NA	FY2010	Never Implemented
Imputed TANF for Voluntary Closures/2009-02	FY2009	FY2009	FY 2013	Concluded
Pilot Rental Subsidy Project/2009-01	FY2009	NA	FY 2009	Never Implemented
Alternate HCV Homeownership Program/2008-02	FY2008	FY2010	FY 2011	Concluded
Flat rent and Flat HCV Subsidy/2007-01	FY2007	NA	FY 2008	Never Implemented
Alternative Rent Reasonable Procedure/2004-01	FY2004	FY2004	FY 2009	Concluded
Escrow Accounts Capped at \$6000/2003-01	FY2003	FY2003	FY 2005	Concluded
"Request Line" Single Waiting List/2002-01	FY2002	FY2002	FY 2003	Concluded
\$480 Deduction for Child Support /2001-02	FY2001	FY2001	FY 2004	Concluded
Eight Percent Earned Income Deduction/2001-01	FY2001	FY2001	FY 2004	Concluded
No Earned Income Disallowance/1999-09	FY1999	FY2009	FY 2015	Concluded
No Flat Rent Option in Public Housing/1999-08	FY1999	FY2009	FY 2015	Concluded
Maximum Family Share 45% of Gross/1999-07	FY1999	FY2009	FY 2005	Concluded
Restrictions on HCV Port-Outs/1999-06	FY1999	FY2009	FY 2005	Concluded
All Households Eligible for Escrow /1999-05	FY1999	FY2009	FY 2005	Concluded
FSS Absorbed into MTW Self-Sufficiency/1999-04	FY1999	FY2009	FY 2005	Concluded
Five-Year Time Limit for Non Eld/Dis/1999-03	FY1999	FY2009	FY 2005	Concluded
Mandatory Self-Sufficiency Program/1999-02	FY1999	FY2009	FY 2005	Concluded
All HCV Port-Ins to be Absorbed by VHA/1999-01	FY1999	FY2009	FY 2001	Concluded

Activity 2010-02: Skyline Crest Campus of Learners

The Skyline Crest Campus of Learners was a partnership between VHA and the residents of Skyline Crest; which was VHA's largest Public Housing Property and is currently a PBV project after conversion under a combination of RAD and Section 18. VHA provided children and young adults' resources and activities through the community center and families were required to develop and commit to success plans centered on their child's school attendance and community involvement. There have been a lot of changes at Skyline over the 10 years since this activity began; including a new Boys and Girls Club onsite as well as the new Bridgeview Resource Center. There are now even more resources and activities for children and VHA has determined that the mandatory success plans are no longer necessary to engage families with these resources and so this MTW activity was concluded in 2019.

Summary of outcomes:

The graduation rate for Skyline high school seniors in 2019 was 85%, or 6 out of 7, which is about the same rate as in recent years and compares very favorably to the rate of other local low-income seniors.

SECTION V: SOURCES AND USES OF FUNDS

A. SOURCES AND USES OF MTW FUNDS

i. Actual Sources of MTW Funds in the Plan Year

The VHA has submitted unaudited and audited information in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System – PHA (FASPHA).

ii. Actual Uses of MTW Funds in the Plan Year

The VHA has submitted unaudited and audited information in the prescribed FDS format through the FASPHA.

iii. Describe Actual Use of MTW Single Fund Flexibility

ACTUAL USE OF SINGLE FUND FLEXIBILITY

During the Plan year VHA used the funding flexibility allowed under MTW to provide additional services for the people we house. We consolidated all of our housing services under the umbrella of Bridgeview Housing. In addition to the grant funded services of Family Self Sufficiency (FSS) and Elderly Service Coordinators, MTW funds support the Community Employment and Education program. Being able to offer employment referrals supports VHA's rent reform activities.

The single fund was also used to fund services at specific properties serving high needs populations such as Lincoln Place, which serves chronically homeless individuals, and Caples Terrace which serves youth transitioning out of foster care.

VHA also funds a local agency's deposit assistance program for persons on our waiting list and also funds anavigation and referral services for the same population. We also paid the tuition costs for HCV applicants and participants who took the Rent Well class offered by a local agency.

VHA is also using single fund flexibility to pay MTW administrative costs and HCV program administrative costs that are not covered by the administrative fee.

B. LOCAL ASSET MANAGEMENT PLAN

i.	Is the MTW PHA allocating costs within statute?	Yes	
ii.	Is the MTW PHA implementing a local asset management p	olan (LAMP)?	No
ii.	Has the MTW PHA provided a LAMP in the appendix?	NA	

iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.

NA		

SECTION VI: ADMINISTRATIVE

A. HUD REVIEWS, AUDITS OR PHYSICAL INSPECTION ISSUES

VHA did not have any HUD reviews, audits and/or physical inspection issues that required action to address the issue in FY2019.

B. AGENCY DIRECTED EVALUATIONS

There were no agency directed evaluations specific to MTW conducted in FY 2019.

C. CERTIFICATION OF STATUTORY REQUIREMENTS

The VHA certifies that it has met the three statutory requirements of:

- 1) Ensuring that at least 75 % of the families assisted by the Agency are very low-income families;
- 2) Continuing to assist substantially the same total number of households as would have been assisted had the VHA not participated in the MTW demonstration, and
- 3) Maintaining a comparable mix of families (by family size) served as would have been served had the VHA not participated in the MTW demonstration.

D. MTW ENERGY PERFORMANCE CONTRACT (EPC) FLEXIBILITY DATA

Not applicable.